



# CITY OF OCEANSIDE

## WATER UTILITIES DEPARTMENT

March 7, 2013

California Air Resources Board

1001 "I" Street

Sacramento, CA 95814

Re: 2013 Investment Plan – WS

To Whom It May Concern,

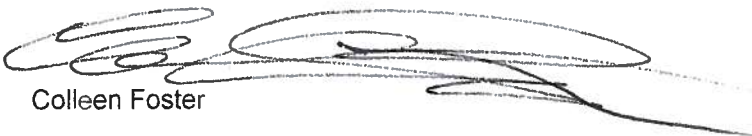
This letter is in response to the Air Resources Board solicitation for stakeholder input on the development of an investment plan for the auction proceeds from the AB 32 Cap-and-Trade program to reduce greenhouse gas emissions. Furthermore, AB 1532 and Senate Bill 535 provides a legislative framework that requires the investment plan to fund greenhouse gas reductions through energy efficiency, clean energy generation, efficient goods movement, water and land use, waste reduction, and research/commercialization of new technologies. The waste reduction objective within this framework are concurrent with the State and the City of Oceanside's own zero waste goals and policies, both of which calls for a 75% recycling rate by 2020. As the City of Oceanside's solid waste manager, I strongly encourage the allocation of financial support to organics processing and recycling market development as a primary step in our State's clean air goals.

Increased capacity for organics (green waste and food waste) processing and collection infrastructure can significantly reduce landfill methane emissions. Compost application results in additional reduced emissions as compared to chemical fertilizers, due to compost being less energy-intensive, water efficient and beneficial to supporting improved soil sequestration. Direct and ongoing incentives for composting and digestion facilities through this investment plan will provide the greatest opportunity in both the short and long term. Immediate investments in grants and loans to capitalize new and expanded facilities would have a significant impact in reducing our waste stream, while also reducing methane emissions from the decomposition of these materials in our landfills.

Additionally, please consider incorporating increased investment into recycling market development. Expansion of recycling markets is necessary in order to grow domestic outlets for recycled materials. Funding support for recycling markets would spur economic development and investment in California recycling infrastructure. Recycling manufacturing avoids emissions from raw materials extraction, primary processing, transportation, and refining. Recycling also promotes forest carbon sequestration, and directly reduces manufacturing emissions by displacing virgin materials which require more energy for processing, and generate more waste. Reintroducing discards with intrinsic energy value back into manufacturing processes will create more local jobs by supporting in-state processing and manufacturing with recycled feedstock.

I greatly appreciate your consideration of my comments.

Thank you,



Colleen Foster

Solid Waste and Recycling – Water Utilities Department